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**VIA ECF**

Honorable James L. Garrity, Jr.  
United States Bankruptcy Court  
One Bowling Green  
New York, New York 10004

**Re: Orly Genger, Debtor; Case No. 19-13895-jlg**

Your Honor:

Reitler Kailas & Rosenblatt LLC (“RKR”) is counsel of record in this case and its related adversary proceedings for Orly Genger (the “Debtor”), the above-reference debtor. In December 2020, two bankruptcy attorneys and I left RKR to form Geron Legal Advisors (“GLA”). It is anticipated that GLA may be substituted as counsel of record for RKR. Discussions concerning GLA’s retention are ongoing. In the meantime, as an accommodation to the Debtor and RKR, GLA is submitting this letter in opposition the discovery sanctions sought by Sagi Genger in his letter, dated July 9, 2020 (DE 291) (the “Letter”). This letter does not constitute GLA’s formal appearance in this case, rather, GLA is submitting this letter to ensure the Court has a complete record in evaluating the relief sought in the Letter, and to ensure that the Court is informed directly that Orly actively and rightfully opposes the relief sought in the Letter

As a threshold matter, as noted in the Debtor’s response to Sagi Genger’s supplemental request for the production of documents served in this bankruptcy proceeding, the Debtor provided all documents that (i) are in her possession, and (ii) have not been previously produced by the Debtor. Specifically, in response to Sagi Genger’s requests for bank and credit card statements, Debtor objected on the grounds that the requests were overbroad and unduly burdensome, subject to protective order(s), and seek documents that are within the possession, custody or control of persons and/or entities other than the Debtor. The Debtor further objected to these specific requests to the extent that they sought documents already produced and in Sagi Genger’s possession, custody or control.



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As to the remaining allegations in the Letter concerning the Debtor's production, we join in Sections 1, 2 and 3 of the opposition submitted by Kasowitz Benson Torres LLP ("KBT") in response to the Letter. The Debtor has been fully compliant with her discovery obligations.

The relief sought in the Letter should be denied.

Respectfully submitted,

*/s/ Yann Geron*

Yann Geron